

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADEMCO INC. (D/B/A RESIDEO),

Plaintiff,

— against —

**TWS TECHNOLOGY
(GUANGZHOU) LIMITED,
TWS TECHNOLOGY LTD. and
TWS TECHNOLOGY LLC,**

Defendants.

No. 23-cv-08383 (AS) (SLC)

**DECLARATION OF
JOHN C. SCALZO**

I, John C. Scalzo, declare as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner at Reed Smith LLP, counsel for TWS Technology (Guangzhou) Limited (“**TWS GZ**”), TWS Technology Ltd. (“**TWS HK**”), and TWS Technology LLC (“**TWS USA**”) (collectively, “**Defendants**”). I am familiar with the facts, pleadings, and proceedings referenced herein, and I submit this Declaration in support of TWS’s motion to dismiss pursuant to Rules 12(b)(2) and (6) of the Federal Rules of Civil Procedure.

2. Pursuant to Rule 8.G. of this Court’s Individual Practices in Civil Cases, a non-argumentative chart identifying the elements of Plaintiff’s claims in its Amended Complaint (ECF 24) (“**FAC**”) that are not sufficiently alleged is attached as **Exhibit 1**.

3. Further, although Plaintiff purported to file a redline showing the changes between its original Complaint and the FAC (ECF 24-8), that redline did not show the allegations that Resideo deleted. For the convenience of the Court and the parties, a redline that clearly shows all substantive additions and deletions to the FAC’s allegations is attached as **Exhibit 2**.

Dated: February 26, 2023
New York, New York

/s/ John C. Scalzo
John C. Scalzo